

Daniel Andrews

From: Daniel Andrews
Sent: Monday, February 11, 2013 11:55 AM
To: 'David Christoffel'
Subject: RE: Brant v. State Farm

David:

We are going to have a real big problem if you are telling me that your expert intends to charge me more to give his deposition than he represents are his charges in the expert disclosures you filed exactly three weeks ago. I will pay him what are the charges as represented to the Western District of Oklahoma, but not a penny more. Let me know if this is going to be an issue. The charge is patently outrageous for a contractor anyway. If it is an issue, I will ask that the court to find a reasonable hourly rate not to exceed \$150 an hour.

Also, Mr. Irmiter's list of cases in which he has testified in the past four years does not appear to be accurate or complete. It says it is only updated through August, for a disclosure in January, so it may not have all of his cases. It also lists Emmanuel Tabernacle, which may or may not be Emmanuel Baptist, and he did not testify in that case. Also, by only listing one party's name, or just saying Federal Court, he is not providing sufficient information to allow me to identify and locate the case myself. See Griffith v. General Motors, 303 F.3d 1276, 1282-83 (11th Cir. 2002). He should look at the way Mr. Schratz did his list for a very good example of how to keep these records. Please provide this updated list in the next seven days and confirm that my client will not be charged more than what are represented to be his charges.

Dan

From: David Christoffel [mailto:David@simplyjustice.com]
Sent: Monday, February 11, 2013 10:01 AM
To: Daniel Andrews
Subject: FW: Brant v. State Farm

Mr. Andrews:

Please find the deposition fee schedule for the Oklahoma City State Farm cases. Please send the check(s) directly to Forensic Building Science and "CC" me.

Thank you,

David Christoffel
Attorney at Law

Please note our new physical and mailing address:

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